THE HONORABLE RICARDO S. MARTINEZ 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 10 COWLITZ COUNTY, a political subdivision of CASE NO. 3:19-cv-06250-RSM Washington, and COWLITZ COUNTY YOUTH 11 SERVICES CENTER, a department of Cowlitz STIPULATED MOTION TO STAY Superior Court, 12 PENDING SETTLEMENT **NEGOTIATIONS** 13 Plaintiffs, 14 VS. 15 UNIVERSITY OF WASHINGTON, a public education institution, and ANGELINA GODOY, 16 Center of Human Rights of University of NOTED ON MOTION CALENDAR: 17 Washington, **OCTOBER 29, 2020** 18 Defendants. 19 and 20 UNITED STATES OF AMERICA, 21 Intervenor, 22 23 **JOINT STIPULATION** 24 The Parties, through their counsel, are currently engaged in settlement negotiations in an effort 25 to resolve this litigation without further motions practice. The parties have made progress towards 26 27 STIPULATED STAY PENDING UNITED STATES ATTORNEY 28

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resolution but need more time to continue these efforts. The parties therefore jointly stipulate that there is good cause for a further 60-day stay of this above-captioned litigation. The Parties request that this Court continue to stay the current briefing deadlines and stay this matter for 60 days, after which the Parties will file a status report apprising the Court of whether this action may be dismissed or whether there are issues in need of resolution by the Court. SO STIPULATED. **DATED** this 29th day of October, 2020. DAVIS WRIGHT TREMAINE LLP **BRIAN T. MORAN** United States Attorney By: s/Eric M Stahl Eric M. Stahl, WSBA #27619 By: *s/ Katie D. Fairchild* 920 Fifth Avenue, Suite 3300 Katie D. Fairchild, WSBA #47712 Seattle, WA 98104-1610 Assistant United States Attorney Telephone: (206) 622-3150 700 Stewart Street, Suite 5220 Fax: (206) 757-7700 Seattle, WA 98101-1271 Email: ericstahl@dwt.com Telephone: (206) 553-4358 Fax: (206) 553-4067 Nancy S. Garland, WSBA #43501 Email: katie.fairchild@usdoj.gov Washington Attorney General's Office Attorneys for the United States University of Washington Division 4333 Brooklyn Avenue NE, 18th Floor Seattle, WA 98195-9475 COWLITZ COUNTY Telephone: (206)543-4150 PROSECUTOR'S OFFICE Fax: (206)543-0779 Email: nancy.garland@atg.wa.gov By: s/Douiglas Emry Jensen Attorneys for University of Washington and Douglas Emry Jensen, WSBA #20127 Professor Angelina Snodgrass Godoy Dana E. Gigler, WSBA #38193 David John Berger, WSBA #48480 312 SW 1st Avenue Kelso, WA 98626 Telephone: (360) 577-3080 Email: jensend@co.cowlitz.wa.us giglerd@co.cowlitz.wa.us Bergerd@co.cowlitz.wa.us Attorneys for Cowlitz County and Cowlitz County Youth Services Center

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UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

ORDER IT IS SO ORDERED. Dated this 29th day of October, 2020. RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE

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